IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI

DAVID DIXON, et al.,	
Plaintiffs	

V.

CITY OF ST. LOUIS, et al.,

Defendants.

Case No. 4:19-cv-112

MOTION FOR TEMPORARY RESTRAINING ORDER

For the reasons stated in the accompanying Memorandum of facts and law, named Plaintiffs David Dixon, Jeffrey Rozelle, Aaron Thurman, and Richard Robards hereby move for a temporary restraining order to immediately end their ongoing unlawful detention by the Defendants.

Respectfully submitted,

/s/ Sima Atri

ARCHCITY DEFENDERS, INC.

Blake A. Strode (MBE #68422MO) Michael-John Voss (MBE #61742MO) Jacqueline Kutnik-Bauder (MBE # 45014MO) Sima Atri (MBE #70489MO) John M. Waldron (MBE #70401MO) 440 N. 4th Street, Suite 390 Saint Louis, MO 63102 855-724-2489 314-925-1307 (fax) bstrode@archcitydefenders.org mjvoss@archcitydefenders.org jkutnikbauder@archcitydefenders.org satri@archcitydefenders.org jwaldron@archcitydefenders.org

ADVANCEMENT PROJECT

/s/ Thomas B. Harvey

Thomas B. Harvey (MBE #61734MO) 1220 L Street, N.W., Suite 850 Washington, DC 20005

Tel: (202) 728-9557 Fax: (202) 728-9558

tharvey@advancementproject.org

INSTITUTE FOR CONSTITUTIONAL ADVOCACY AND PROTECTION (ICAP)

/s/ Seth Wayne

Seth Wayne

D.C. Bar No. 888273445

(pro hac vice application forthcoming)

Nicolas Riley*

N.Y. Bar No. 5039607

(pro hac vice application forthcoming)

Robert Friedman

D.C. Bar No. 1046738

(pro hac vice application forthcoming)

Institute for Constitutional Advocacy and Protection

Georgetown University Law Center

600 New Jersey Ave. NW

Washington, D.C. 20001

Tel: 202-662-9042

sw1098@georgetown.edu

rdf34@georgetown.edu

nr537@georgetown.edu

* Admitted solely to practice law in New York; not admitted in the District of Columbia. Practice is limited pursuant to D.C. App. R. 49(c)(3).

CIVIL RIGHTS CORPS

/s/ Alec Karakatsanis

Alec Karakatsanis

D.C. Bar No. 999294

(pro hac vice application forthcoming)

Civil Rights Corps

910 17th Street NW, Suite 200 Washington, DC 20006

Tel: 202-599-0953 Fax: 202-609-8030

alec@civilrightscorps.org

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of January, 2019, I electronically filed the foregoing with the clerk of the court for the U.S. District Court, Eastern District of Missouri, using the electronic case filing system of the Court. This Motion for Temporary Restraining Order will be served in accordance with the Federal Rules of Civil Procedure.

/s/ Sima Atri